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United States of America  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff/Respondent,  
13 v.  
14 BAO LU, SON VAN NGUYEN, THY  
CHANN, and HOANG AI LE,  
15 Defendant/Movant.  
16

2:99-CR-00433-WBS-AC

CONSOLIDATED STIPULATION AND  
[PROPOSED] ORDER FOR SECOND EXTENSION  
OF TIME IN WHICH TO FILE OBJECTIONS TO  
MAGISTRATE JUDGE'S FINDINGS AND  
RECOMMENDATIONS.

(ECF. 1807 – 1810)

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18 Respondent United States of America, by and through its attorneys of record, McGregor W.  
19 Scott, United States Attorney, and Jason Hitt, Assistant United States Attorney, hereby requests an  
20 additional 30-day extension of time until October 23, 2019, in which to file its consolidated objections to  
21 Magistrate Judge's findings and recommendations. Docket Nos. 1807-1810.

22 For the past three weeks, counsel for the Government has been in trial preparations and trial in  
23 *US v. Sherman, et al.*, 2:13-CR-00302-MCE, which concluded on September 19, 2019. The additional  
24 time will give me additional time to interpret additional guidance with regard to the recent decisions in  
25 *United States v. Davis*, 677 Fed. Appx. 933 and *United States v. Begay*, \_\_\_ F.3d \_\_\_, 2019 WL  
26 3884261. This, in turn, will provide sufficient time to draft and file appropriate objections.

27 Geoffrey M. Jones, counsel for Hoang Ai Le, does not oppose the Government's request.

28 Katherine Hart, counsel for Bao Lu, does not oppose the Government's request.

1 Lindsay Weston, counsel for Thy Chann, does not oppose the Government's request.

2 Benjamin Ramos, counsel for Son Van Nguyen, does not oppose the Government's request.

3  
4 Dated: September 23, 2019

McGREGOR W. SCOTT  
United States Attorney

5  
6 /s/ JASON HITT

JASON HITT  
Assistant United States Attorney

7  
8 Dated: September 23, 2019

/s/ GEOFFREY JONES

GEOFFREY JONES  
Attorney for Hoang Ai Le

9  
10 Dated: September 23, 2019

/s/ KATHERINE HART

KATHERINE HART  
Attorney for Bao Lu

11  
12 Dated: September 23, 2019

/s/ LINDSAY WESTON

LINDSAY WESTON  
Attorney for Thy Chann

13  
14 Dated: September 23, 2019

/s/ BENJAMIN RAMOS


BENJAMIN RAMOS  
Attorney for Son Van Nguyen

1 **[PROPOSED] ORDER**

2 The Court, having received, read, and considered the stipulation of the parties, and good cause  
3 appearing therefrom, adopts the stipulation of the parties in its entirety as its order.

4 It is further ordered that the Government's Consolidated Objections to the Magistrate Judge's  
5 Findings and Recommendations is now due October 23, 2019.

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7 Dated: September 24, 2019

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9 ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE